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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry St.
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC No.: WW-5

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

**DECLARATION IN SUPPORT OF APPLICATION FOR ORDER SHORTENING TIME
AND PRESCRIBING NOTICE OF HEARING ON MOTION FOR ENTRY OF AN
ORDER (1) DIRECTING AND APPROVING FORM OF NOTICE OF
COMMENCEMENT; (2) SETTING DEADLINE FOR FILING OBJECTIONS TO
PETITION; and (3) FOR RELIEF UNDER CHAPTER 9**

1 I, Danielle J. Bethel, hereby declare and represent as follows:

2 1. I am counsel for the Debtor and maintain an office at 205 East River Park
3 Circle, Suite 410, Fresno, California 93720.

4 2. The Debtor seeks to have the Court approve the Motion/Application
5 attached hereto as Exhibit A on shortened notice.
6

7 3. The Debtor seeks authority to notice the hearing for November 16, 2017,
8 at 9:30 a.m. and proposes to give notice by facsimile, e-mail, or first class mail by
9 November 1, 2017, to the list of twenty largest unsecured creditors as amended plus
10 any persons who have requested special notice, the Debtor, Healthcare Conglomerate
11 Associates, LLC, Wilmington Trust as Successor Indenture Trustee and Successor
12 Paying Agent, California Department of Public Health, and the U.S. Trustee's Office.
13

14 4. The interests of the Debtor and creditors will be served by shortening time
15 because the creditors of the Debtor need to be given notice of commencement of this
16 Chapter 9 case as soon as possible and because the nature of the relief requested by
17 the Motion/Application involves the setting of a deadline to object to the Debtor's
18 Chapter 9 Petition, which, if such objections are filed may trigger litigation thereby
19 delaying the entry of an order for relief.
20

21 5. The Debtor seeks relief as soon as possible and a hearing on shortened
22 time is needed.

23 I declare under penalty of perjury that the foregoing facts are true and correct
24 under the laws of the United States.

25 Executed this 30th day of October, 2017, at Fresno, California.

26
27 
28 Danielle J. Bethel